



**Service of Process  
Transmittal**

03/07/2011

CT Log Number 518143984

**TO:** Sylvia Lacy-Crow, Corporate Information Manager  
BAE SYSTEMS Holdings Inc.  
13850 McLearen Road  
Herndon, VA 20171-

**RE: Process Served in New Jersey**

**FOR:** Safariland, LLC (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Brian Sampson and Maria Sampson, etc., Pltf. vs. Glock, et al. including Safariland, LLC, Dfts.

**DOCUMENT(S) SERVED:** Letter, Summons (2 sets), Information Statement (2 sets), Complaint and Jury Demand (2 sets)

**COURT/AGENCY:** Morris County: Superior Court, Law Division, NJ  
Case # MRS-L-434-11

**NATURE OF ACTION:** Product Liability Litigation - Manufacturing Defect - Personal Injury - Holster not reasonably fit or safe for its intended purpose due to its failure to contain adequate warnings or instructions - Holster Model 6000-38321-121

**ON WHOM PROCESS WAS SERVED:** The Corporation Trust Company, West Trenton, NJ

**DATE AND HOUR OF SERVICE:** By Certified Mail on 03/07/2011 postmarked on 03/03/2011

**JURISDICTION SERVED :** New Jersey

**APPEARANCE OR ANSWER DUE:** Within 35 days, not counting the date you received it

**ATTORNEY(S) / SENDER(S):** Robin D. Kobin  
Nusbaum, Stein, Goldstein, Bronstein & Kron, P.C.  
20 Commerce Boulevard  
Suite E  
Succasunna, NJ 07876  
973-584-1400

**ACTION ITEMS:** CT has retained the current log, Retain Date: 03/07/2011, Expected Purge Date: 03/12/2011  
Image SOP  
Email Notification, Sylvia Lacy-Crow SYLVIA.LACY-CROW@BAESYSTEMS.COM  
Email Notification, Pat Huff pat.huff@baesystems.com

**SIGNED:** The Corporation Trust Company  
**PER:** Tyeasha Harris  
**ADDRESS:** 820 Bear Tavern Road  
3rd Floor  
West Trenton, NJ 08628  
**TELEPHONE:** 609-538-1818

## NUSBAUM, STEIN, GOLDSTEIN, BRONSTEIN & KRON

A Professional Corporation  
Counsellors At Law

20 Commerce Boulevard, Suite E  
Succasunna, New Jersey 07876  
973-584-1400  
Fax: 973-584-8747  
Email: nsgbk.office@verizon.net

- Of Counsel -  
PAUL R. NUSBAUM

LEWIS STEIN\*  
ALAN D. GOLDSTEIN  
RONALD W. BRONSTEIN  
PATRICIA E. ROCHE\*  
LARRY I. KRON  
ROBERT D. KOBIN<sup>o</sup>  
SHARON L. FREEMAN+ ^  
SUSAN B. REED  
STEVEN J. LOEWENTHAL <sup>o</sup>

CERTIFIED BY THE SUPREME COURT OF  
NEW JERSEY AS A  
\*Civil Trial Attorney  
\*Matrimonial Attorney  
^Workers' Compensation Attorney  
<sup>o</sup>Member Florida Bar  
<sup>o</sup>Member New York Bar  
+Member Pennsylvania Bar

March 3, 2011

Certified Mail R.R.  
Corporation Trust Company  
820 Bear Tavern Road  
West Trenton, NJ 08628

RE: Brian Sampson v. Glock, Ges m.b.H., et al.  
Docket No.: MRS-L-434-11

Dear Sir/Madam:

Enclosed please find a Summons and Complaint on behalf of Brian Sampson, filed by this office in the Superior Court, Law Division, Morris County.

I would suggest you forward this Summons & Complaint directly to your attorney so this matter can proceed in due course.

Thank you for your attention to this matter.

Very truly yours,



Robert D. Kobin

RDK/em  
enc.

NUSBAUM, STEIN, GOLDSTEIN,  
BRONSTEIN & KRON, P.A.  
20 Commerce Boulevard, Suite E  
Succasunna, New Jersey 07876  
(973) 584-1400  
Attorneys for Plaintiff

BRIAN SAMPSON and MARIA SAMPSON,  
his wife,

Plaintiffs,

vs.

GLOCK, Ges. m.b.H., GLOCK INC.,  
SAFARILAND, LLC, STREAMLIGHT CORP.,  
ABC CORP. 1-10

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - MORRIS COUNTY

Docket No. MRS-L-434-11

Civil Action

**SUMMONS**

The State of New Jersey, to the Above Named Defendant: SAFARILAND, LLC

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) A \$135.00 filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. The phone numbers for the county in which this action is pending are: Legal Services Office (973) 285-6911, and Lawyer Referral Services Office (973) 267-5882.



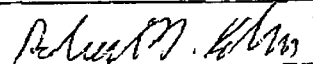
DATED: March 3, 2011

/s/ Jennifer M. Perez  
JENNIFER M. PEREZ, Clerk

Name and Address of Defendant:

Corporation Trust Company  
820 Bear Tavern Road  
West Trenton, NJ 08628

## Appendix XII-B1

 <b>CIVIL CASE INFORMATION STATEMENT (CIS)</b> Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 <b>Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed</b>		FOR USE BY CLERK'S OFFICE ONLY	
		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA	CHG/CK NO.
ATTORNEY / PRO SE NAME Robert D. Kobin, Esq.		TELEPHONE NUMBER (973) 584-1400	COUNTY OF VENUE Morris
FIRM NAME (if applicable) Nusbaum, Stein, Goldstein, Bronstein & Kron, PA		DOCKET NUMBER (when available) <b>L-434-11</b>	
OFFICE ADDRESS 20 Commerce Blvd., Suite E Succasunna, NJ 07876		DOCUMENT TYPE Complaint	
		JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
NAME OF PARTY (e.g., John Doe, Plaintiff) Brian Sampson and Maria Sampson, his wife	CAPTION Brian Sampson and Maria Sampson v. Glock, Ges. m.b.H., Glock Inc., Safariland, LLC, Streamlight Corp. and ABC Corp. 1-10,		
CASE TYPE NUMBER (See reverse side for listing) 606	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN		
<b>THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.</b>			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION			
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION	
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE?	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
ATTORNEY SIGNATURE 			

Side 2



## CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under *Rule 4:5-1*

**CASE TYPES** (Choose one and enter number of case type in appropriate space on the reverse side.)

**Track I - 150 days' discovery**

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

**Track II - 300 days' discovery**

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 803N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 810 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

**Track III - 450 days' discovery**

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 806 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

**Track IV - Active Case Management by Individual Judge / 450 days' discovery**

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

**Centrally Managed Litigation (Track IV)**

- 280 ZELNORM
- 285 STRYKER TRIDENT HIP IMPLANTS
- 288 PRUDENTIAL TORT LITIGATION

- 290 POMPTON LAKES ENVIRONMENTAL LITIGATION
- 291 PELVIC MESH/GYNECARE
- 292 PELVIC MESH/BARD

**Mass Tort (Track IV)**

- 248 CIBA GEIGY
- 266 HORMONE REPLACEMENT THERAPY (HRT)
- 271 ACCUTANE
- 274 RISPERDAL/SEROQUEL/ZYPREXA
- 275 ORTHO EVRA
- 277 MAHWAH TOXIC DUMP SITE
- 278 ZOMETA/AREXIA
- 279 GADOLINIUM

- 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL
- 282 FOSAMAX
- 283 DIGITEK
- 284 NUVARING
- 288 LEVAQUIN
- 287 YAZ/YASMIN/OCELLA
- 601 ASBESTOS

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category

☐

Putative Class Action

☐

Title 59

NUSBAUM, STEIN, GOLDSTEIN  
BRONSTEIN & KRON, P.A.  
20 Commerce Boulevard, Suite E  
Succasunna, New Jersey 07876  
(973) 584-1400  
Attorneys for Plaintiff

RECEIVED & FILED  
SUPERIOR COURT  
2011 FEB 10 P 3:07  
CIVIL DIVISION

BRIAN SAMPSON and MARIA  
SAMPSON, his wife,

Plaintiff,

v.

GLOCK, Ges. m.b.H., GLOCK  
INC., SAFARILAND, LLC  
STREAMLIGHT CORP.  
ABC CORP. 1-10

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: MORRIS COUNTY

Docket No. MRS L- 434-11  
Civil Action

COMPLAINT AND JURY DEMAND

Plaintiffs, Brian Sampson and Maria Sampson, residing 21 Snover Road,  
Wantage, Sussex County, New Jersey by way of complaint against the  
Defendants say:

#### THE PARTIES

1. Defendant Glock Ges. m.b.H., is a company headquartered in the Republic of Austria which designs, manufactures, and distributes Glock pistols including but not limited to the Glock pistol which is the subject of this action. Defendant Glock, Inc. is a foreign profit corporation of the State of Georgia with a principal business address of 6000 Highlands Parkway, Smyrna, Georgia 30082 with an agent for service of process, National Registered Agents, Inc. of NJ, 100 Canal Pointe Blvd., Suite 108, Princeton, NJ 08540 and was in the business of manufacturing, designing and distributing Glock pistols and

specifically the Glock 21, .45 caliber handgun Serial #KSG697 which is the subject of this action. Hereinafter Defendant Glock Ges. m.b.H., and Defendant Glock, Inc. shall be collectively referred to as "Defendants Glock".

2. Defendant Safariland is a foreign corporation of the State of Delaware with a main business address of 13386 International Parkway, Jacksonville, FL 32218 and maintains an agent for service of process at the Corporation Trust Company, 820 Bear Tavern Road, West Trenton, NJ 08628 and is in the business of manufacturing, distributing, and designing holsters to be used for various pistol applications in law enforcement. Defendant Safariland manufactured, distributed and/or designed the Safariland Model 6004-38321-121 Tactical Leg Holster which is the subject of this action.

3. Defendant Streamlight Corporation is a foreign corporation of the State of Delaware with a main business address of 30 Eagleville Road, Eagleville, PA 19403 and maintains an agent for service of process at the NJ Department of the Treasury Division of Purchase and Property, Trenton, NJ 08625. Defendant Streamlight Corporation is in the business of manufacturing, distributing, and designing lights and/or lasers for attachment to pistols such as the Glock 21 .45 caliber handgun utilized by the Plaintiff in this matter. Defendant Streamlight Corporation manufactured, distributed and/or designed the Streamlight TLR-1 which is the subject of this action.

4. Defendant ABC Corps. 1-10 are fictitious corporations whose identities are unknown at this time who were in the business of manufacturing, designing and/or distributing the Glock 21, .45 caliber handgun, and/or the

Streamlight TLR-1 and/or the Safariland Model 6004-38321-121 Tactical Leg Holster used by the Plaintiff at the time of the within accident. Should continuing discovery reveal the true identities of Defendant ABC Corps., 1-10 this complaint shall be amended to include the same.

#### FACTUAL BACKGROUND

1. At all times relevant hereto Plaintiff Brian Sampson was employed as a Police Officer for the Town of Florham Park Police Department, Morris County, New Jersey.
2. On or about February 13, 2009, during the course of his employment as an Officer in the Florham Park Police Department, Plaintiff Brian Sampson was on his way to the firing range for scheduled ERT Training (Emergency Response Training). At the time of the incident, Plaintiff Brian Sampson was wearing his Safariland Tactical Leg Holster Model 6000-38321-121 (hereinafter referred to as "the holster"). In the Safariland Holster was the Plaintiff's Glock 21 .45 caliber handgun (hereinafter referred to as "the Glock gun") on which was mounted a Streamlight TLR-1 (hereinafter referred to as the "Streamlight"). While proceeding through the hallway of the Florham Park Police Department the Glock 21 .45 caliber handgun discharged. The Plaintiff did not have his hand on the weapon at the time of the discharge. The bullet from the discharged weapon struck the Plaintiff in the lower right leg/right ankle area causing severe and permanent injury. At the time of the incident the Glock gun was maintained pursuant to any and all safety and maintenance requirements, and was placed and carried in the holster pursuant to all safety



requirements. Further, at the time of the incident the Streamlight was properly mounted on the Glock gun pursuant to all safety requirements and was maintained on the Glock gun and placed in the holster in a proper fashion. Throughout the relevant timeframe, Plaintiff Brian Sampson handled the Glock gun, the holster and the Streamlight in a safe and appropriate manner. The Plaintiff did not engage in any activity or action during the relevant timeframe that could have resulted in the discharge of the Glock gun.

#### FIRST COUNT

1. Plaintiff Brian Sampson repeats and reiterates the allegations in the Factual and Parties sections of this Complaint as if set forth verbatim herein.
2. The aforementioned identified Glock gun was not reasonably fit, suitable or safe for its intended purpose in that: (a) the Glock gun deviated from the design specifications, formulae, or performance standards of the manufacturer or from otherwise identical units manufactured to the same manufacturing specifications or formulae, or (b) failed to contain adequate warnings or instructions, or (c) was designed in a defective manner thereby causing unreasonable risk of harm to Plaintiff Brian Sampson.
3. As a result of the Glock gun not being reasonably fit or safe for its intended purpose, Defendants Glock are strictly liable to the Plaintiff in accordance with the provisions of N.J.S.A. 2A:58C-1 et. seq.
4. As a result of the Glock gun not being reasonably fit or safe for its intended purpose, the Plaintiff Brian Sampson was directly caused serious and permanent bodily injury.

WHEREFORE, Plaintiff Brian Sampson demands judgment against Defendants Glock and ABC Corp. 1-10 jointly, severally or in the alternative for compensatory damages, punitive damages, attorneys fees, medical expenses, lost income, interest and costs of suit.

SECOND COUNT

1. Plaintiff Brian Sampson repeats and reiterates the allegations in the Factual and Parties sections of this Complaint and the First Count as if set forth verbatim herein.

2. The aforementioned identified holster was not reasonably fit, suitable or safe for its intended purpose in that: (a) the holster deviated from the design specifications, formulae, or performance standards of the manufacturer or from otherwise identical units manufactured to the same manufacturing specifications or formulae, or (b) failed to contain adequate warnings or instructions, or (c) was designed in a defective manner thereby causing unreasonable risk of harm to Plaintiff Brian Sampson.

3. As a result of the holster not being reasonably fit or safe for its intended purpose, Defendant Safariland is strictly liable to the Plaintiff in accordance with the provisions of N.J.S.A. 2A:58C-1 et. seq.

4. As a result of the holster not being reasonably fit or safe for its intended purpose, the Plaintiff Brian Sampson was directly caused serious and permanent bodily injury.

WHEREFORE, Plaintiff Brian Sampson demands judgment against Defendants Glock, ABC Corp. 1-10 and Safariland jointly, severally or in the

alternative for compensatory damages, punitive damages, attorneys fees, medical expenses, lost income, interest and costs of suit.

### THIRD COUNT

1. Plaintiff Brian Sampson repeats and reiterates the allegations in the Factual and Parties sections of this Complaint and the First and Second Counts as if set forth verbatim herein.

2. The aforementioned identified Streamlight was not reasonably fit, suitable or safe for its intended purpose in that: (a) the Streamlight deviated from the design specifications, formulae, or performance standards of the manufacturer or from otherwise identical units manufactured to the same manufacturing specifications or formulae, or (b) failed to contain adequate warnings or instructions, or (c) was designed in a defective manner thereby causing unreasonable risk of harm to Plaintiff Brian Sampson.

3. As a result of the Streamlight not being reasonably fit or safe for its intended purpose, Defendant Streamlight is strictly liable to the Plaintiff in accordance with the provisions of N.J.S.A. 2A:58C-1 et. seq.

4. As a result of the Streamlight not being reasonably fit or safe for its intended purpose, the Plaintiff Brian Sampson was directly caused serious and permanent bodily injury.

WHEREFORE, Plaintiff Brian Sampson demands judgment against Defendants Glock, ABC Corp. 1-10, Safariland and Streamlight, jointly, severally or in the alternative for compensatory damages, punitive damages, attorneys fees, medical expenses, lost income, interest and costs of suit.

#### FOURTH COUNT

1. Plaintiff Maria Sampson repeats the allegations contained in the Factual and Parties sections of this Complaint and the First, Second and Third Counts as if set forth verbatim herein.

2. Plaintiff Maria Sampson is the spouse of Plaintiff Brian Sampson.

3. As a further result of the wrongful conduct of the Defendants, Plaintiff Maria Sampson has suffered and shall continue to suffer the loss of companionship, consortium, and services during the period of Plaintiff Brian Sampson's disability.

WHEREFORE, the Plaintiff Maria Sampson demands judgment against the Defendants Defendants Glock, ABC Corp. 1-10, Safariland and Streamlight, jointly, severally or in the alternative for compensatory damages, punitive damages, attorneys fees, medical expenses, lost income, interest and costs of suit.

#### CERTIFICATION

1. The within matter in controversy is the subject of a workers' compensation claim under the CP# 2009-28954 entitled Brian Sampson v. Florham Park Police Department.

2. No other action or an arbitration proceeding is contemplated by plaintiff herein.

3. No other party should presently be joined in this action.

#### DESIGNATION OF TRIAL COUNSEL

In accordance with R. 4:25, Robert D. Kobin, Esq. is hereby designated as trial counsel for the Plaintiff in the above matter.

DEMAND FOR INTERROGATORIES

Plaintiff hereby demands that Defendants provide answers to Uniform Interrogatories Form C, and Form C(4) within the timeframe provided by the Rules of Court.

DEMAND FOR DOCUMENTS

Plaintiff demands that Defendants provide Plaintiff with a true and accurate copy of Defendants' Insurance Agreement including Excess Coverage Policies under which any person or firm carrying on an insurance business may be entered in this action or to indemnity or reimburse for payments made to satisfy the judgment, within the time frame prescribed by the Rules of Court.

JURY DEMAND

Plaintiffs hereby demand trial by jury.

NUSBAUM, STEIN, GOLDSTEIN,  
BRONSTEIN & KRON, P.A.

By:   
Robert D. Kobin

Date: February 10, 2011

RECEIVED & FILED  
SUPERIOR COURT  
2011 FEB 10 P 3:07  
CIVIL DIVISION

NUSBAUM, STEIN, GOLDSTEIN,  
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 20 Commerce Boulevard, Suite E  
 Succasunna, New Jersey 07876  
 (973) 584-1400  
 Attorneys for Plaintiff

BRIAN SAMPSON and MARIA SAMPSON,  
 his wife,  
  
 Plaintiffs,  
  
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 Defendants.

SUPERIOR COURT OF NEW JERSEY  
 LAW DIVISION - MORRIS COUNTY

Docket No. MRS-L-434-11

Civil Action

**SUMMONS**

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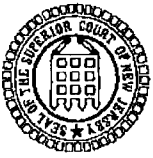
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DATED: March 3, 2011

/s/ Jennifer M. Perez  
 JENNIFER M. PEREZ, Clerk

Name and Address of Defendant: Corporation Trust Company  
 820 Bear Tavern Road  
 West Trenton, NJ 08628

## Appendix XII-B1

 <b>CIVIL CASE INFORMATION STATEMENT (CIS)</b> Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 <b>Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed</b>		FOR USE BY CLERK'S OFFICE ONLY	
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ATTORNEY / PRO SE NAME Robert D. Kobin, Esq.		TELEPHONE NUMBER (973) 584-1400	COUNTY OF VENUE Morris
FIRM NAME (if applicable) Nusbaum, Stein, Goldstein, Bronstein & Kron, PA		DOCKET NUMBER (when available) <b>L-434-11</b>	
OFFICE ADDRESS 20 Commerce Blvd., Suite E Succasunna, NJ 07876		DOCUMENT TYPE Complaint	
		JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
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CASE TYPE NUMBER (See reverse side for listing) 606	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
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WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE?	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
ATTORNEY SIGNATURE: <i>Robert D. Kobin</i>			

Side 2



# CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

**CASE TYPES** (Choose one and enter number of case type in appropriate space on the reverse side.)

**Track I - 150 days' discovery**

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

**Track II - 300 days' discovery**

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 899 TORT - OTHER

**Track III - 450 days' discovery**

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

**Track IV - Active Case Management by Individual Judge / 450 days' discovery**

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

**Centrally Managed Litigation (Track IV)**

- 280 ZELNORM
- 285 STRYKER TRIDENT HIP IMPLANTS
- 288 PRUDENTIAL TORT LITIGATION

- 290 POMPTON LAKES ENVIRONMENTAL LITIGATION
- 291 PELVIC MESH/GYNECARE
- 292 PELVIC MESH/BARD

**Mass Tort (Track IV)**

- 248 CIBA GEIGY
- 266 HORMONE REPLACEMENT THERAPY (HRT)
- 271 ACCUTANE
- 274 RISPERDAL/SEROQUEL/ZYPREXA
- 275 ORTHO EVRA
- 277 MAHWAH TOXIC DUMP SITE
- 278 ZOMETHA/AREDDIA
- 279 GADOLINIUM

- 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL
- 282 FOSAMAX
- 283 DIGITEK
- 284 NUVARING
- 286 LEVAQUIN
- 287 YAZ/YASMIN/OCELLA
- 601 ASBESTOS

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 59



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BRONSTEIN & KRON, P.A.  
20 Commerce Boulevard, Suite E  
Succasunna, New Jersey 07876  
(973) 584-1400  
Attorneys for Plaintiff

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SUPERIOR COURT  
2011 FEB 10 P 3:07  
CIVIL DIVISION

BRIAN SAMPSON and MARIA  
SAMPSON, his wife,  
Plaintiff,

v.

GLOCK, Ges. m.b.H., GLOCK  
INC., SAFARILAND, LLC  
STREAMLIGHT CORP.  
ABC CORP. 1-10  
Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: MORRIS COUNTY

Docket No. MRS L- 434-11  
Civil Action

COMPLAINT AND JURY DEMAND

Plaintiffs, Brian Sampson and Maria Sampson, residing 21 Snover Road,  
Wantage, Sussex County, New Jersey by way of complaint against the  
Defendants say:

#### THE PARTIES

1. Defendant Glock Ges. m.b.H., is a company headquartered in the Republic of Austria which designs, manufactures, and distributes Glock pistols including but not limited to the Glock pistol which is the subject of this action. Defendant Glock, Inc. is a foreign profit corporation of the State of Georgia with a principal business address of 6000 Highlands Parkway, Smyrna, Georgia 30082 with an agent for service of process, National Registered Agents, Inc. of NJ, 100 Canal Pointe Blvd., Suite 108, Princeton, NJ 08540 and was in the business of manufacturing, designing and distributing Glock pistols and

specifically the Glock 21, .45 caliber handgun Serial #KSG697 which is the subject of this action. Hereinafter Defendant Glock Ges. m.b.H., and Defendant Glock, Inc. shall be collectively referred to as "Defendants Glock".

2. Defendant Safariland is a foreign corporation of the State of Delaware with a main business address of 13386 International Parkway, Jacksonville, FL 32218 and maintains an agent for service of process at the Corporation Trust Company, 820 Bear Tavern Road, West Trenton, NJ 08628 and is in the business of manufacturing, distributing, and designing holsters to be used for various pistol applications in law enforcement. Defendant Safariland manufactured, distributed and/or designed the Safariland Model 6004-38321-121 Tactical Leg Holster which is the subject of this action.

3. Defendant Streamlight Corporation is a foreign corporation of the State of Delaware with a main business address of 30 Eagleville Road, Eagleville, PA 19403 and maintains an agent for service of process at the NJ Department of the Treasury Division of Purchase and Property, Trenton, NJ 08625. Defendant Streamlight Corporation is in the business of manufacturing, distributing, and designing lights and/or lasers for attachment to pistols such as the Glock 21 .45 caliber handgun utilized by the Plaintiff in this matter. Defendant Streamlight Corporation manufactured, distributed and/or designed the Streamlight TLR-1 which is the subject of this action.

4. Defendant ABC Corps. 1-10 are fictitious corporations whose identities are unknown at this time who were in the business of manufacturing, designing and/or distributing the Glock 21, .45 caliber handgun, and/or the

Streamlight TLR-1 and/or the Safariland Model 6004-38321-121 Tactical Leg Holster used by the Plaintiff at the time of the within accident. Should continuing discovery reveal the true identities of Defendant ABC Corps., 1-10 this complaint shall be amended to include the same.

#### FACTUAL BACKGROUND

1. At all times relevant hereto Plaintiff Brian Sampson was employed as a Police Officer for the Town of Florham Park Police Department, Morris County, New Jersey.

2. On or about February 13, 2009, during the course of his employment as an Officer in the Florham Park Police Department, Plaintiff Brian Sampson was on his way to the firing range for scheduled ERT Training (Emergency Response Training). At the time of the incident, Plaintiff Brian Sampson was wearing his Safariland Tactical Leg Holster Model 6000-38321-121 (hereinafter referred to as "the holster"). In the Safariland Holster was the Plaintiff's Glock 21 .45 caliber handgun (hereinafter referred to as "the Glock gun") on which was mounted a Streamlight TLR-1 (hereinafter referred to as the "Streamlight"). While proceeding through the hallway of the Florham Park Police Department the Glock 21 .45 caliber handgun discharged. The Plaintiff did not have his hand on the weapon at the time of the discharge. The bullet from the discharged weapon struck the Plaintiff in the lower right leg/right ankle area causing severe and permanent injury. At the time of the incident the Glock gun was maintained pursuant to any and all safety and maintenance requirements, and was placed and carried in the holster pursuant to all safety

requirements. Further, at the time of the incident the Streamlight was properly mounted on the Glock gun pursuant to all safety requirements and was maintained on the Glock gun and placed in the holster in a proper fashion. Throughout the relevant timeframe, Plaintiff Brian Sampson handled the Glock gun, the holster and the Streamlight in a safe and appropriate manner. The Plaintiff did not engage in any activity or action during the relevant timeframe that could have resulted in the discharge of the Glock gun.

#### FIRST COUNT

1. Plaintiff Brian Sampson repeats and reiterates the allegations in the Factual and Parties sections of this Complaint as if set forth verbatim herein.

2. The aforementioned identified Glock gun was not reasonably fit, suitable or safe for its intended purpose in that: (a) the Glock gun deviated from the design specifications, formulae, or performance standards of the manufacturer or from otherwise identical units manufactured to the same manufacturing specifications or formulae, or (b) failed to contain adequate warnings or instructions, or (c) was designed in a defective manner thereby causing unreasonable risk of harm to Plaintiff Brian Sampson.

3. As a result of the Glock gun not being reasonably fit or safe for its intended purpose, Defendants Glock are strictly liable to the Plaintiff in accordance with the provisions of N.J.S.A. 2A:58C-1 et. seq.

4. As a result of the Glock gun not being reasonably fit or safe for its intended purpose, the Plaintiff Brian Sampson was directly caused serious and permanent bodily injury.

WHEREFORE, Plaintiff Brian Sampson demands judgment against Defendants Glock and ABC Corp. 1-10 jointly, severally or in the alternative for compensatory damages, punitive damages, attorneys fees, medical expenses, lost income, interest and costs of suit.

SECOND COUNT

1. Plaintiff Brian Sampson repeats and reiterates the allegations in the Factual and Parties sections of this Complaint and the First Count as if set forth verbatim herein.

2. The aforementioned identified holster was not reasonably fit, suitable or safe for its intended purpose in that: (a) the holster deviated from the design specifications, formulae, or performance standards of the manufacturer or from otherwise identical units manufactured to the same manufacturing specifications or formulae, or (b) failed to contain adequate warnings or instructions, or (c) was designed in a defective manner thereby causing unreasonable risk of harm to Plaintiff Brian Sampson.

3. As a result of the holster not being reasonably fit or safe for its intended purpose, Defendant Safariland is strictly liable to the Plaintiff in accordance with the provisions of N.J.S.A. 2A:58C-1 et. seq.

4. As a result of the holster not being reasonably fit or safe for its intended purpose, the Plaintiff Brian Sampson was directly caused serious and permanent bodily injury.

WHEREFORE, Plaintiff Brian Sampson demands judgment against Defendants Glock, ABC Corp. 1-10 and Safariland jointly, severally or in the

alternative for compensatory damages, punitive damages, attorneys fees, medical expenses, lost income, interest and costs of suit.

### THIRD COUNT

1. Plaintiff Brian Sampson repeats and reiterates the allegations in the Factual and Parties sections of this Complaint and the First and Second Counts as if set forth verbatim herein.

2. The aforementioned identified Streamlight was not reasonably fit, suitable or safe for its intended purpose in that: (a) the Streamlight deviated from the design specifications, formulae, or performance standards of the manufacturer or from otherwise identical units manufactured to the same manufacturing specifications or formulae, or (b) failed to contain adequate warnings or instructions, or (c) was designed in a defective manner thereby causing unreasonable risk of harm to Plaintiff Brian Sampson.

3. As a result of the Streamlight not being reasonably fit or safe for its intended purpose, Defendant Streamlight is strictly liable to the Plaintiff in accordance with the provisions of N.J.S.A. 2A:58C-1 et. seq.

4. As a result of the Streamlight not being reasonably fit or safe for its intended purpose, the Plaintiff Brian Sampson was directly caused serious and permanent bodily injury.

WHEREFORE, Plaintiff Brian Sampson demands judgment against Defendants Glock, ABC Corp. 1-10, Safariland and Streamlight, jointly, severally or in the alternative for compensatory damages, punitive damages, attorneys fees, medical expenses, lost income, interest and costs of suit.

#### FOURTH COUNT

1. Plaintiff Maria Sampson repeats the allegations contained in the Factual and Parties sections of this Complaint and the First, Second and Third Counts as if set forth verbatim herein.

2. Plaintiff Maria Sampson is the spouse of Plaintiff Brian Sampson.

3. As a further result of the wrongful conduct of the Defendants, Plaintiff Maria Sampson has suffered and shall continue to suffer the loss of companionship, consortium, and services during the period of Plaintiff Brian Sampson's disability.

WHEREFORE, the Plaintiff Maria Sampson demands judgment against the Defendants Defendants Glock, ABC Corp. 1-10, Safariland and Streamlight, jointly, severally or in the alternative for compensatory damages, punitive damages, attorneys fees, medical expenses, lost income, interest and costs of suit.

#### CERTIFICATION

1. The within matter in controversy is the subject of a workers' compensation claim under the CP# 2009-28954 entitled Brian Sampson v. Florham Park Police Department.

2. No other action or an arbitration proceeding is contemplated by plaintiff herein.

3. No other party should presently be joined in this action.

#### DESIGNATION OF TRIAL COUNSEL

In accordance with R. 4:25, Robert D. Kobin, Esq. is hereby designated as trial counsel for the Plaintiff in the above matter.

DEMAND FOR INTERROGATORIES

Plaintiff hereby demands that Defendants provide answers to Uniform Interrogatories Form C, and Form C(4) within the timeframe provided by the Rules of Court.

DEMAND FOR DOCUMENTS

Plaintiff demands that Defendants provide Plaintiff with a true and accurate copy of Defendants' Insurance Agreement including Excess Coverage Policies under which any person or firm carrying on an insurance business may be entered in this action or to indemnity or reimburse for payments made to satisfy the judgment, within the time frame prescribed by the Rules of Court.

JURY DEMAND

Plaintiffs hereby demand trial by jury.

NUSBAUM, STEIN, GOLDSTEIN,  
BRONSTEIN & KRON, P.A.

By: Robert D. Kobin  
Robert D. Kobin

Date: February 10, 2011

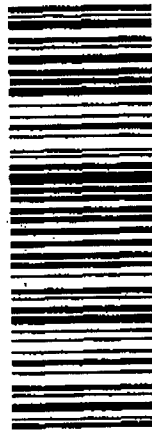
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CIVIL DIVISION



NUSBAUM, STEIN, GOLDSTEIN,  
COUNSELLORS  
20 COMMERCE BOULE  
SUCCASUNNA, N

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OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

**CERTIFIED MAIL<sup>TM</sup>**



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Corporation Trust Company  
820 Bear Tavern Road  
West Trenton, NJ 08628